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Attorneys for Defendant Zuffa, LLC

UNITED STATES DISTRICT COURT FOR NEVADA

EVERETT BLOOM, on behalf of himself, and
those similarly situated,

Plaintiff,

v.

ZUFFA, LLC,

Defendant.

Case No.: 2:22-cv-00412-RFB-BNW

**JOINT STIPULATION TO CONTINUE
DEADLINE FOR CLASS
CERTIFICATION**

This stipulation is between Plaintiff, Everett Bloom, on behalf of himself, the general public and those similarly situated ("Plaintiff") and Zuffa, LLC ("Defendant") (together, "the Parties"). The Parties have agreed as follows:

1 WHEREAS, the Court's May 25, 2022 Case Management Order (ECF 32) set a deadline
2 of January 4, 2023, for Plaintiff's motion for class certification and disclosure of expert reports
3 relating to class certification.

4 WHEREAS, following the Case Management Order, the Parties negotiated a joint
5 stipulation extending the deadline for Plaintiff's motion for class certification and disclosure of
6 expert reports relating to class certification to April 4, 2023, in order to facilitate further
7 discovery, which was adopted by this Court on November 29, 2023 (ECF 38 & 39).

8 WHEREAS, on March 13, 2023, the Parties submitted a second joint stipulation
9 extending the deadline for Plaintiff's motion for class certification and disclosure of expert
10 reports relating to class certification to June 3, 2023, which was adopted by this Court on March
11 14, 2023 (ECF 40 & 41), to accommodate the resolution of Plaintiff's subpoena served on Meta
12 Platforms, Inc. (d/b/a Facebook).¹

13 WHEREAS, the Parties then agreed to postpone certain depositions pending private
14 mediation on March 30, 2023, but were unsuccessful in resolving the case.

15 WHEREAS, Plaintiff served amended notices of depositions in mid-April 2023.

16 WHEREAS, the only date that is mutually agreeable to hold one such deposition is May
17 31, 2023, which Plaintiff contends affords insufficient time before the current June 2, 2023,
18 deadline for the motion for class certification.

19 WHEREAS, the Parties agree that allowing a small amount of additional time to
20 accommodate this deposition would benefit both Parties.

21 The Parties hereby stipulate to a one-week (7-day) extension of the current class
22 certification deadline to June 9, 2023.

23
24
25
26 ¹ Plaintiff moved to compel Meta Platforms to comply with the subpoena in *Bloom v. Meta*
27 *Platforms, Inc.*, No. 3:2023-mc-80137 (N.D. Cal. Apr. 25, 2023). The District Court for the
28 Northern District of California has not yet set a briefing schedule for that motion.

STIPULATED AND AGREED to this 24rd day of May 2023.

/Anthony J. Patek/

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IT IS SO ORDERED

DATED: 11:50 am, May 30, 2023



**BRENDA WEKSLER
UNITED STATES MAGISTRATE JUDGE**